

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ETHEREUM VENTURES, LLC,

Plaintiff,

v.

CHET MINING CO LLC and CHET
STOJANOVICH,

Defendant.

No. 1:19-cv-7949 (LLS)

**VENABLE LLP'S MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR
DEFENDANTS CHET MINING CO LLC AND CHET STOJANOVICH**

Pursuant to Rule 1.4 of the Local Civil Rules of the United States District Court for the Southern District of New York, the undersigned, on behalf of himself and the firm Venable LLP, hereby moves to withdraw as counsel of record for Defendants Chet Mining Co LLC and Chet Stojanovich (collectively, "Defendants").

In support of this motion, the undersigned states and affirms that:

- This case was initially filed in the Southern District of New York. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS). Attorneys from Venable LLP appeared on behalf of Defendants.
- Defendants have failed to provide any payment to retain Venable LLP's counsel.
- This matter is in its earliest stages. Subsequent to the filing of the Complaint, Plaintiff and Defendants filed a joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 10. On December 5, 2019, the Court entered a stipulation and order extending Defendants' time to respond and/or answer Plaintiff's Complaint from December 16, 2019 to December 23, 2019. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 11. On

December 23, 2019, Plaintiff and Defendants filed another joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint from December 23, 2019 to January 6, 2019. See S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 12.

- The Court did not take any action with respect to the pending stipulation and order to extend time.
- Venable LLP is not asserting a retainer or charging lien in this matter.

For these reasons, the parties and the Court will not be prejudiced by the withdrawal of the attorneys of Venable LLP as counsel for Defendants. Therefore, the undersigned respectfully requests that the Court to grant the motion for Venable LLP to withdraw as counsel of record for Defendants.

Dated: New York, New York
January 6, 2020

VENABLE LLP

By: /s/ Edmund M. O'Toole
Edmund M. O'Toole

VENABLE LLP
1270 Avenue of the Americas, 24th Floor
New York, New York 10020
Tel.:(212) 307-5500

SO ORDERED this ____ day of _____, 2020:

United States District Judge

CERTIFICATE OF SERVICE

I, Edmund M. O'Toole, hereby certify that on January 6, 2020, I caused the foregoing Motion to Withdraw as Counsel of Record to be filed electronically and served on counsel of record via the Court's ECF system.

By: */s/ Edmund M. O'Toole*
Edmund M. O'Toole